

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Case No. _____

Aaron Christmann,)	
)	
Plaintiff,)	
v.)	COMPLAINT FOR RELIEF
WageWorks, Inc.,)	PURSUANT TO 29 USC § 1132 -
)	ERISA
)	
Defendant.)	
)	

Plaintiff, Aaron Christmann, by his attorney, Nathan M. Hansen,
respectfully alleges:

1. Plaintiff is an individual who is a citizen of the United States.
2. The Defendant is a Delaware Corporation registered with the Minnesota Secretary of State with an office address of 1010 Dale Street N, St. Paul, MN, 55117.
3. The Defendant is engaged in the business of providing employee benefits and the Plaintiff's interaction with it involves the administration of a Flexible Spending Account through his employer.
4. The Plaintiff has exhausted all of his administrative remedies against the Plaintiff or is excused from exercising them.
5. From 2015 to the present, the Defendant has inappropriately denied claims of the Plaintiff as follows:

Total unpaid claims for FSA reimbursement from Wageworks and Medtronic

a. 2015: \$ 87.00 (claimed by April 2016)

b. 2017: \$ 599.89

\$ 2,500.00

c. 2018: \$1,660.00

\$ 60.00

\$ 95.90

\$ 582.78

d. 2019: \$1,542.50

\$1,734.05

e. Total= \$ 8,862.12

6. The Plaintiff asserts claims based on the foregoing allegations under ERISA § 502(a), including § 502(a)(1)(B).
7. The Plaintiff has been damaged as a result of the Defendant's failure to pay benefits due to him and seeks payments from the Defendant for payments due to him.

Wherefore, the Plaintiff requests the following relief:

1. A money judgment against the Defendant in the amount of \$8,862.12;
2. An award of allowed costs and disbursements;
3. Any other relief deemed just and equitable.

Dated: March 30, 2023

/S/ Nathan M. Hansen

Nathan M. Hansen

ATTORNEY FOR PLAINTIFF

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